

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DAVID J. HOFFENKAMP, individually,
and on behalf of all others similarly situated,

Plaintiff,

v.

KOPLAN WELSH AND ASSOCIATES,

Defendant.

Case No. 1:21-cv-04523

Honorable Martha M. Pacold

REQUEST FOR ENTRY OF CLERK'S DEFAULT

NOW COMES David J. Hoffenkamp ("Plaintiff"), and pursuant to Fed. R. Civ. P. 55(a), seeking the entry of a Clerk's default against Koplan Welsh and Associates ("Defendant"), and in support thereof, stating as follows:

1. On August 24, 2021, Plaintiff filed the instant class action against Defendant seeking redress for violations of the of the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. § 1692 *et. seq.*, violations of the Telephone Consumer Protection Act ("TCPA"), 47 U.S.C. §227 *et seq.*, and violations of the Illinois Consumer Fraud Act ("ICFA"), 815 ILCS 505/1. [Dkt.

1]

2. Plaintiff's claims arise from Defendant's abusive and unlawful debt collection practices.

3. On September 9, 2021, Defendant was served with Plaintiff's complaint. [Dkt. 8]

4. Defendant's responsive pleading was due on or before September 30, 2021.

5. Despite being duly served with Plaintiff's complaint, Defendant has failed to appear or otherwise respond to Plaintiff's complaint.

6. Pursuant to Fed. R. Civ. P. 55(a), Plaintiff is seeking the entry of a Clerk's default as a result of Defendant's failure to respond to Plaintiff's complaint.

WHEREFORE, Plaintiff respectfully requests the entry of a Clerk's default against Defendant, and for any further relief the Court deems just and proper.

Dated: October 26, 2021

Respectfully submitted,

DAVID J. HOFFENKAMP

By: /s/ Mohammed O. Badwan
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2021, I electronically filed the foregoing with the Clerk of the Court for the Northern District of Illinois by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

I further certify that some of the participants in the case are not CM/ECF users. I have mailed the foregoing motion by USPS Priority Mail, postage prepaid, to the following participants:

KOPLAN WELSH AND ASSOCIATES
C/O REGISTERED AGENT
DELAWARE BUSINESS INCORPORATORS, INC.
3422 OLD CAPITOL TRL STE 700
WILMINGTON, DE 19808

/s/ Mohammed O. Badwan